## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California Corporation,

> Plaintiff and Counterclaim-Defendant,

٧.

INTERNET SECURITY SYSTEMS, INC., a Delaware corporation, INTERNET SECURITY SYSTEMS, INC., a Georgia corporation, and SYMANTEC CORPORATION, a Delaware corporation,

> Defendants and Counterclaim-Plaintiffs.

Civil Action No. 04-CV-1199 (SLR)

## FILED UNDER SEAL

THIS DOCUMENT CONTAINS MATERIALS WHICH ARE CONFIDENTIAL OR **RESTRICTED CONFIDENTIAL - SOURCE** CODE AND COVERED BY A PROTECTIVE ORDER. THIS DOCUMENT SHALL NOT BE MADE AVAILABLE TO ANY PERSON OTHER THAN THE COURT AND OUTSIDE COUNSEL OF RECORD FOR THE PARTIES.

## DECLARATION OF PAUL S. GREWAL IN SUPPORT OF SYMANTEC CORPORATION'S MOTION FOR SUMMARY JUDGMENT OF NON-**INFRINGEMENT**

## I, Paul S. Grewal, declare as follows:

- I am a member of the law firm of Day Casebeer Madrid & Batchelder LLP, counsel for 1. Defendant Symantec Corporation. I am admitted to practice law before all courts of the State of California.
- I make this declaration of my own personal knowledge. If called to testify as to the truth 2. of the matters stated herein, I could and would do so competently.
  - Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,321,338. 3.
  - Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 6,708,212. 4.
  - Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 6,484,203. 5.

- Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 6,711,615. 6.
- Attached hereto as Exhibit E is a true and correct copy of selected pages of the 5/26/06 7. and 5/27/06 deposition transcripts of Dr. George Kesidis.
- Attached hereto as Exhibit F is a true and correct copy of the Declaration of Dr. Jeffery 8. Hansen.
- Attached hereto as Exhibit G is a true and correct copy of the Expert Report of Dr. 9. George Kesidis on Infringement.
- Attached hereto as Exhibit H is a true and correct copy of selected pages of the deposition 10. transcript of Dr. Jeffery Hansen.
- Attached hereto as Exhibit I is a true and correct copy of selected pages of the deposition 11. transcript of Brian Hernacki.
- Attached hereto as Exhibit J is a true and correct copy of selected pages of the deposition 12. transcript of Jeremy Bennett.
- Attached hereto as Exhibit K is a true and correct copy of selected pages of the deposition 13. transcript of Howard Lev.
- Attached hereto as Exhibit L is a true and correct copy of selected pages of the deposition 14. transcript of Tasha Van Es.
- Attached hereto as Exhibit M is a true and correct copy of Mike Smith and Mark 15. Janczura, Draft Architecture / Process List Design Doc. For SNS 5.0, modified August 5, 2005 bearing BATES Production Nos.: SYM\_P 0136893-0136916.
- Attached hereto as Exhibit N is a true and correct copy of a Recourse Technologies Q&A 16. document regarding ManHunt 2.0 bearing BATES Production Nos.: SYM\_P\_0176251-0176253.
  - Attached hereto as Exhibit O is a true and correct copy of M. Lyle and Brandon Suzuki, 17.

Recourse Technologies, FlowChaser Data Store (FDS) Specification, modified July 1, 2002 bearing BATES Production Nos.: SYM\_P\_0134095-0134099.

- 18. Attached hereto as Exhibit P is a true and correct copy of the Declaration of Jeremy F. Bennett.
- 19. Attached hereto as Exhibit Q is a true and correct copy of the Declaration of Brandon Suzuki.
- 20. Attached hereto as Exhibit R is a true and correct copy of selected pages of the deposition transcript of Paul Agbabian.
- 21. Attached hereto as Exhibit S is a true and correct copy of the deposition transcript of Carolyn Bardani.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: June 16, 2006

By: Paul S. AromoO

Paul S. Grewal